

# **Exhibit B**

## **Corning Declaration**

### DECLARATION OF SARAH FRANCES CORNING

I, Sarah Frances Corning, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the facts stated herein are true and correct, to the best of my knowledge and belief:

1. I am an attorney and Legal Fellow at the American Civil Liberties Union of Texas and am one of the attorneys representing the Petitioners and putative class in *W.M.M. v. Trump*, No. 25-cv-69-H (N.D. Tex.). I make this Declaration based upon personal knowledge, except where otherwise indicated.
2. In the evening of April 17, 2025, my colleague, Ashley Harris, and I both drove to Abilene, Texas because we were notified that individuals held in the Bluebonnet Detention Center in the Northern District of Texas were given Alien Enemies Act (“AEA”) notices and told they would be deported imminently.
3. We arrived at the Bluebonnet Detention Center the next morning, on April 18, 2025. Upon arrival, we requested to speak with 10 individuals, including named Petitioner, F.G.M.
4. I am fluent in both English and Spanish. I spoke with F.G.M. around 2:30 PM on that day in Spanish. F.G.M. stated that he was given a notice on Thursday, April 17. In the morning of the 18th, an officer told him that he might be deported that evening.
5. In my conversation with F.G.M., he relayed: He could not read the notice because he cannot read English. He was not offered translation or interpretation of the notice into Spanish by the officers. The officers told F.G.M. that he would be deported whether or not he signed the notice.
6. F.G.M. showed me the notice he received. Attached to this declaration is a true and correct copy of a photograph that I took of F.G.M.’s notice. His name is listed last name first, follow by first name so the initials appear as G.M., F.A. The attached version of the notice is redacted of F.G.M.’s full name and personal identifying information. An unredacted version of the notice has already been provided to the government’s counsel in this case, and can be submitted under seal to the Court if necessary.
7. I also translated a declaration from F.G.M. about his experience. F.G.M.’s declaration uses as his initials “FAGM.” F.G.M. and F.A.G.M. refer to the same person. The “A” stands for his middle name.

Executed this 29th day of April, 2025 in Austin, Texas.

/s/ Sarah Frances Corning

Sarah Frances Corning



**NOTICE AND WARRANT OF APPREHENSION AND REMOVAL  
UNDER THE ALIEN ENEMIES ACT**

A-File No: \_\_\_\_\_ Date: 4/17/2025  
 In the Matter of: G [REDACTED] M [REDACTED] F [REDACTED] A [REDACTED]  
 Date of Birth: [REDACTED] 2002 Sex: Male ☒ Female ☐

**Warrant of Apprehension and Removal**

**To any authorized law enforcement officer:**

The President has found that Tren de Aragua is perpetrating, attempting, or threatening an invasion or predatory incursion against the territory of the United States, and that Tren de Aragua members are thus Alien Enemies removable under Title 50, United States Code, Section 21.

G [REDACTED] M [REDACTED] F [REDACTED] A [REDACTED] has been determined to be: (1) at least fourteen years of age; (2) not a citizen or lawful permanent resident of the United States; (3) a citizen of Venezuela; and (4) a member of Tren de Aragua. Accordingly, he or she has been determined to be an Alien Enemy and, under Title 50, United States Code, Section 21, he or she shall be apprehended, restrained, and removed from the United States pursuant to this Warrant of Apprehension and Removal.

**Signature of Supervisory Officer:** \_\_\_\_\_

**Title of Officer:** (A) FOO

**Date:** 4-17-2025

**Notice to Alien Enemy**

I am a law enforcement officer authorized to apprehend, restrain, and remove Alien Enemies. You have been determined to be at least fourteen years of age; not a citizen or lawful permanent resident of the United States; a citizen of Venezuela; and a member of Tren de Aragua. Accordingly, under the Alien Enemies Act, you have been determined to be an Alien Enemy subject to apprehension, restraint, and removal from the United States. Until you are removed from the United States, you will be detained under Title 50, United States Code, Section 21. Any statement you make now or while you are in custody may be used against you in any administrative or criminal proceeding. This is not a removal under the Immigration and Nationality Act. If you desire to make a phone call, you will be permitted to do so.

After being removed from the United States, you must request and obtain permission from the Secretary of Homeland Security to enter or attempt to enter the United States at any time. Should you enter or attempt to enter the United States without receiving such permission, you will be subject to immediate removal and may be subject to criminal prosecution and imprisonment.

**Signature of alien:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I personally served a copy of this Notice and Warrant upon the above-named person on \_\_\_\_\_ (Date)  
 and ensured it was read to this person in a language he or she understands.

\_\_\_\_\_  
 Name of officer/agent

\_\_\_\_\_  
 Signature of officer/agent

Form AEA-21B